

ST. CLAIR COUNTY COMMUNITY MENTAL HEALTH AUTHORITY

BOARD POLICY

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I. APPLICATION:

- ☒ SCCCMHA Board
- ☒ SCCCMHA Providers & Subcontractors
- ☒ Direct-Operated Programs
- ☒ Community Agency Contractors
- ☐ Residential Programs
- ☐ Specialized Foster Care

II. POLICY STATEMENT:

St. Clair County Community Mental Health Agency (SCCCMHA) Board will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in our services, activities, programs and other supports. The policy of SCCCMHA is to ensure meaningful communication with individuals who have limited English proficiency and their authorized representatives involving their medical/behavioral health conditions and treatment. The policy also provides for communication of information contained in vital documents, including but not limited to, waivers of rights, consent to treatment forms, financial and insurance benefit forms, etc. All interpreters, translators and other aids needed to comply with this policy shall be provided without cost to the person being served, and individuals and their families will be informed of the availability of such assistance free of charge.

Language assistance will be provided through use of competent bilingual staff, staff interpreters, contracts or formal arrangements with local organizations providing interpretation or translation services, or technology (i.e. video) and telephonic interpretation services. All staff will be provided notice of this policy and procedure, and staff that may have direct contact with individuals who have limited English proficiency will be trained in effective communication techniques, including the effective use of an interpreter.

SCCCMHA will conduct a regular review of the language access needs of our population, as well as update and monitor the implementation of this policy and these procedures, as necessary.

III. DEFINITIONS:

- A. **Basic Reading Level:** The reading level at which an individual is able to understand the overall meaning of what they read.

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- B. Limited English Proficiency (LEP): Persons who do not speak English as their primary language or who have a limited ability to read, write, speak, or understand English.
- C. Linguistically Appropriate Services: Services provided in the language best understood by the individual receiving services through bilingual staff and/or the use of qualified interpreters, including American Sign Language (ASL), to individuals with LEP. These services are a core element of cultural competency and reflect an understanding, acceptance, and respect for the cultural values, beliefs, and practices of the community of individuals with LEP.

IV. STANDARDS:

- A. SCCCMHA and its Provider Network shall provide reasonable access to linguistically appropriate services based on the needs of the population served.
- B. SCCCMHA will ensure service information is offered in a manner easily understood by the population served.
- C. Policies and administrative procedures will address the special needs of individuals with LEP.
- D. LEP reference is maintained at the Main Reception Areas of each site, which includes “I Speak Cards” for language identification use.
- E. If an individual requests services and is unable to effectively communicate using English, any office and/or program must have processes in place to facilitate communication in order for the individual to obtain access to services.

V. PROCEDURES:

Staff

1. Uses varied/creative methods of communication based on the cultural background of the individual. These may include (but are not limited to):
 - a. Pad and pencil.
 - b. Picture board.
 - c. Use of interpreters, either in person or via phone and/or video based upon availability.
 - d. Use of an individual’s family member as interpreter only if it is the person’s choice and after they have been informed that an interpreter is available to them at no additional expense.
 - e. Electronic Health Record (EHR) information can be translated into specific languages at the individual’s request.

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2. Uses culturally and linguistically appropriate screening tools when appropriate.

Administration

- 1.. Provides agency information in varied forms that may be understood by all persons.
This may include (but is not limited to):
 - a. Key brochures printed in languages that support the cultural ethnicity of the individual and are recorded to meet the needs of individuals with a visual impairment.
 - b. Agency brochures written at a basic reading level, easy to read font, with frequent headings, and short simple explanations of key concepts.
 - c. Video and/or audio tapes describing services available, appeals process, and other vital information.
2. Provides for contract interpretation services in languages relevant to the population served, either in person or via telephone and/or video based upon availability.
3. Ensures employees receive LEP training upon initial hire and at intervals required by accreditation, regulatory and licensing bodies.
4. Ensures interpreters are trained to function in a medical and behavioral health setting, and understand and adhere to confidentiality and privacy requirements.

Safety Committee

1. Ensures agency signage incorporates internationally recognized symbols as well as Braille as required by law.

Community Relations Team

1. Seeks out venues to promote agency services to community residents who have LEP. This may include, but is not limited to:
 - a. Radio advertisements.
 - b. Participation in health fairs targeted for groups which may include an LEP population.

VI. REFERENCES:

- A. Americans with Disabilities ACT of 1990 (ADA)
- B. MDHHS Contract
- C. *4.30.4 – Raised and Brailed Characteristics and Pictorial Symbol Signs (Pictograms)

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D. Michigan Building Code

E. HHS.Gov/civil-rights

Office of Civil Rights Policy Guidance on the Title VI Prohibition Against Discrimination

F. CCBHC Handbook and certification criteria

VII. EXHIBITS:

A. St. Clair County Community Mental Health Authority “Tips for Respecting Diversity in the Workplace”

VIII. REVISION HISTORY:

Dates issued 02/02, 10/03, 10/05, 10/07, 10/09, 08/11, 01/13, 01/14, 01/15, 03/16, 03/17, 03/18, 03/19, 03/20, 04/21, 03/22, 03/23.

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Tips for Respecting Diversity in the Workplace

1. Do not label people, instead ask the person how he/she/they would like to be addressed.
2. If a person identifies as Hispanic, Chicano, Puerto Rican, Black, Asian, or other name, providers should not assume they know what that means, instead, find out what that means for the individual.
3. If you want to know about a cultural practice, put your question in a work context related to your reason for interviewing the person.
4. Respect personal boundaries, people always have a choice in how they choose to respond. Our role is to provide the options and related outcomes.
5. If a person becomes angry after you make a statement and your intent was not to offend, apologize and ask what you can do to assist. Stay focused on providing quality services.
6. Always address individuals in a non-judgmental manner. Staff actions should be based on facts and not on perceptions or assumptions.
7. Do not impose your values on others at work. We are here to implement the values of the Agency.
8. When an individual's primary language is not English, do not assume that he/she/they do not speak English. Ask the question, and if an interpreter is required, one can be requested.
9. When an individual has a hearing impairment, ask the individual *, parent, guardian or significant other if he/she/they requires an interpreter during the appointment/meeting.
10. If you don't understand a person's communication style, ask for clarification. If you are uncomfortable clarifying, ask another staff member for assistance.

*** THE PERSON MAY LIP READ AND SHOULD BE INCLUDED IN ANY CONVERSATION ABOUT HIM/HER/THEMSELF.**

Adapted for SCCMHA from Cultural Diversity Training